

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.  
04-10894-MEL

DOUGLAS DAVIS

Plaintiff,

VS.

WOODS HOLE, MARTHA'S VINEYARD  
AND NANTUCKET STEAMSHIP  
AUTHORITY

Defendant.

**JOINT SCHEDULING STATEMENT**

Now come the parties, in the above captioned action, by and through their undersigned counsel, after conferencing pursuant to Local Rule 16.1(B) of the United States District Court, District of Massachusetts, hereby file this proposed Joint Scheduling Statement.

**I. DISCOVERY**

The parties propose the following discovery plan:

- A. All discovery and factual depositions to be completed by June 21, 2005.
- B. Plaintiff's designation of experts and disclosure of expert information and reports pursuant to the Federal Rules of Civil Procedure served on or before July 21, 2005.
- C. Defendant's designation of experts and disclosure of expert information and reports pursuant to the Federal Rules of Civil Procedure served on or before August 21, 2005.

- D. All expert depositions to be completed by October 21, 2005.
- E. Final Pretrial Conference to be scheduled after December 21, 2005.

**II. MOTION SCHEDULE**

In addition to the above, the parties propose the following motion schedule.

- A. Motions to amend the pleadings, to add parties or to set forth additional claims to be filed on or before November 30, 2004.
- B. Dispositive Motions to be filed by November 30, 2005 with Oppositions filed within twenty-one (21) days as set forth in the Local Rules of this Court.

**III. CERTIFICATION**

The parties report that they have conferred with their clients pursuant to Local Rule 16.1(D)(3) and will independently file their Certificates of Compliance.

**IV. TRIAL BY MAGISTRATE JUDGE**

The parties do not consent to trial by Magistrate Judge.

**V. SETTLEMENT**

The plaintiff has tendered an oral settlement demand to the defendant.

**WHEREFORE**, the parties pray that this Honorable Court approve the above proposed schedule.

Respectfully Submitted,

**PLAINTIFF**  
**Orlando & Associates**

**DEFENDANT**  
**CLINTON & MUZYKA, P.C.,**

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Dated: October 18, 2004